

ORDER #

96-RF-3286

DIST.	LTR	ENC
SUSSEN, STAN		
L, TONY		
D, BOB		
JOHN	X	X
I, VIK		
TINEZ, LEN		
NALLY, JIM		
AY, BOB		
IEN, GEORGE		
R, NANCY		
RHEIS, GARY		
LER, CAL		



KAISER HILL
COMPANY

July 1, 1996

96-RF-03986

J. K. Hartman
Deputy Assistant Manager
Environmental Compliance
DOE, RFFO

INDIVIDUAL HAZARDOUS SUBSTANCE SITE GROUPS 117.3 AND 152 - TGH-133-96

Ref: J. Roberson ltr, (09959) to J. Hill, Same Subject, April 30, 1996

Kaiser-Hill (K-H) is in receipt of the above referenced letter regarding the reclassification of Individual Hazardous Substance Site (IHSS) 152.

K-H acknowledges DOE's request to proceed with the Tanks 221 and 224 Decommissioning project performing the tasks under the auspices of the Colorado Petroleum Storage Tank Act.

K-H accepts this direction and will remediate as required. At this time, the current sampling programs have not identified any contamination by petroleum products. Sampling will take place after the removal of both structures to determine if in fact there is any contamination present.

Your letter is correct in stating that there is no process for reclassification of an IHSS at the Rocky Flats Environmental Technology Site. K-H plans to reclassify IHSS 152 as a non-IHSS per the reasoning identified in the T. G. Hedahl letter (TGH-049-96), dated March 13, 1996. This will allow the corrective action to take place under the Colorado Petroleum Storage Tank Act.

It is K-H's position that the tasks for the completion of the tank project cannot be performed as outlined in your letter. The letter states that the project site be remediated under the Tank Act, while classified as a IHSS. This conflicts with the corrective action process as outlined in the Rocky Flats Cleanup Agreements (RFCA) for IHSSs.

K-H is going to proceed with reclassifying IHSS 152 to a non-IHSS. K-H will contact the Colorado Department of Public Health and Environment and the Environmental Protection Agency to initiate this action. It is anticipated that this course of action can be managed by the RFCA signatories and incorporated with no additional public comment.

DOE's request does not change the current scope, schedule, or budget for completing this project.

RES. CONTROL X X
N RECRD/080
FIC
T130G

CLASSIFICATION:

ASSIFIED
IDENTIAL
IET

AUTHORIZED CLASSIFIER
SIGNATURE:

apt per CEX-266-95

7-1-96

REPLY TO RFP CC NO.:

606 RF 96

ACTION ITEM STATUS:

PARTIAL/OPEN

CLOSED

LTR APPROVALS:

T. G. Hedahl, Director
ER/WM&I Operations

IG. & TYPIST INITIALS:

KAD :bag

KAD:bag

Orig. and 1 cc - J. Hartman

ADMIN RECCRD

er-Hill Company, L.L.C.

ier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000

ing Address: P.O. Box 464, Golden, Colorado 80402-0464

IA-A-000383

PAC REFERENCE NUMBER: 600-117.3

IHSS Reference Number: 117.3, Operable Unit 13

Unit Name: Chemical Storage - South Site

Approximate Location: N749,500; E2,083,000

Date(s) of Operation or Occurrence

Prior to 1965 - 1969

Description of Operation or Occurrence

Various RFP photographs indicate that the area southwest of the intersection of Central Avenue and Sage Street was used for storage from approximately 1964 until 1969. Presently, there are two Number 6 Fuel Oil tanks at the site. They consist of an 800,000-gallon capacity tank, Tank 221, which was built in 1955, and a 1,800,000-gallon capacity tank, Tank 224, which was built in 1973. Tank 221 is located west of Tank 224.

Low-level oblique RFP photographs show miscellaneous materials stored in the area around Tank 221 from at least 1965 to June 1969.^{1,2,3,4} Wooden boxes are evident south and east of Tank 221 in 1965 and 1966.^{1,2} It appears that drums were stored east of Tank 221 in 1966.² In 1969, wooden boxes, reportedly containing contaminated debris from the May 1969 fire in Building 776 and Building 777, are evident east of Tank 221.³ By 1969, the boxes were no longer stored in this area.^{3,4}

On May 4, 1965, a glovebox (H-22), which was being transferred from Building 776 to the south site chemical storage area, leaked highly contaminated oil along the last 400 feet of the route, near the intersection of A and G Roads,⁶ which are now referred to as Central Avenue and 7th Street. The glovebox, which had been used for heat treating product material, was considered excess contaminated property and was being removed for disposal. Although the glovebox had been packaged in a plastic sheet-lined wooden waste box, the oil escaped from the box.⁷ Approximately 2 to 3 liters of oil was released, contaminating Central Avenue, some ground at the storage area, a fork lift, a flatbed and a pick-up truck.⁶

The leaking oil affected a strip of pavement approximately 18 inches wide,⁸ and approximately 900 square feet of earth.⁹ The glovebox was placed on plastic sheeting at the corner of Seventh Street and Central Avenue until removal.⁸

On June 15, 1965, a leaking waste box was discovered in the "waste storage area south of 51." The box was returned to Building 881 for investigation and repackaging.¹⁰ It is likely that the "area south of 51" was IHSS 117.3.

Physical/Chemical Description of Constituents Released

The oil released during the May 1965 incident contained plutonium,¹¹ and was considered to be highly contaminated. Oil spots on the road were monitored by alpha survey instruments and had measurements of greater than 100,000 cpm.⁷

No documentation was found regarding the constituents of the material leaking from the waste box in the June 1965 incident.

Responses to Operation or Occurrence

The asphalt contaminated by the May 1965 incident was removed, placed in lined barrels and buried in a sludge pit. The soil affected by the leaking glovebox was also removed and drummed, in preparation for offsite disposal.^{7,9} Removal of the soil under the glovebox was completed on May 7, 1965.¹²

No documentation was found regarding cleanup following the June 1965 incident.

Fate of Constituents Released to Environment

No documentation was found which detailed the fate of the constituents released to the environment.

This IHSS is being studied in accordance with the IAG schedule for Operable Unit 13. However, the information developed on this unit for this study indicates that the IHSS location presented in the IAG is inaccurate (see Comments). The IAG activities will include site investigation, site characterization, and possible site remediation. The Final Phase I RFI/RI Report is to be completed by January 11, 1995.

Comments

Storage of materials similar to those stored at the south site chemical storage area (PAC 600-117.3) also occurred south of Tank 221, in the Building 444 Parking Lot (see PAC 600-160).

It is believed that the referenced sludge pit in which the contaminated asphalt was buried is one of the sewage sludge disposal trenches (PAC NE-111.1 - NE-111.8).

Since the contaminated oil release in 1965 affected the pavement along the last 400 feet of the transport route, it is proposed that the boundaries for this IHSS be extended to include 400 feet of Central Avenue east of Seventh Street.

References

- ¹ 1800285
- ² 1502717
- ³ 1800275
- ⁴ 1700834
- ⁵ 1502787
- ⁶ 1500640
- ⁷ 1501193
- ⁸ 1601057
- ⁹ 1700450
- ¹⁰ 1501157
- ¹¹ 1501782
- ¹² 1501146

Other References of Interest

- 1500643
- 1500447
- 1600131
- 1501144
- 1600183

COPY

WASTE RELEASE EVALUATION

PRE Number: 960813-T690B-003

Charge Number: 319004.00

EXTENDED: _____ EXPIRES: _____

PART I

SENDER/CUSTODIAN

Description of Property/Waste To Be Released/Transferred:

Trash bags containing oil rags and coveralls with oil on them

Property's Current Location:

Tanks 221 and 224

Property's Destination:

Land fill

Property's New Recipient/Custodian:

RMRS

Property History/Process Knowledge:

The oil on the rags and coveralls came from the #6 fuel oil from the 221 and 224 tanks.

Note: After this WRE was written, it was determined this waste could not be disposed of in the on-site landfill due to hydrocarbon content. The waste was sent to DAD's landfill instead without the WRE being revised.
D.A. Russell Dennis A. Russell 519645 11-7-96

Has the specified property/waste ever been in an RMMA/ or contacted DOE controlled radioactive materials?

NO

ACKNOWLEDGEMENT:

By signing below, the sender/custodian verifies the information above to be true and correct.

Sender/Custodian: *[Signature]* Emp.No.: [REDACTED] Date: 8.13-76 Ext: 6256 Pager: 0757

PART II

RADIOLOGICAL ENGINEERING

No Radiological Survey is required due the waste's location, history, and /or characteristics

SPECIFIC REQUIREMENTS AND/OR COMMENTS:

The material has never been in a RMMA or posted radiological area. The material has never come in contact with DOE controlled radioactive material. The #6 fuel oil was released, reference PRE # 090694-T690B-006-REV ONE

Evaluated: *[Signature]* Emp.No.: [REDACTED] Date: 8/13/96 Ext.: 4025 Pager: 2523
RE

APPROVAL FOR TRANSFER/SHIPMENT

The waste may be released to the recipient indicated in Part I.

Approved: *[Signature]* Emp.No.: [REDACTED] Date: 8/13/96 Ext.: 7870 Pager: 2974
RE

Date December 15, 1987
Revision No. 1.0
3004 (u)

Blake construction 12/7/95 10¹⁵
Oct/Nov 1986 leading to 1st Part B

listed in 3004(u) to be complete - phase 1

Reference No.: 152

Unit Name: Fuel Oil Tank Spill

Type of Unit: Spill not associated with a Solid Waste
Phase II was supposed to
Segregate all inclusions
list into CERCLA, RCRA, no SWMU,
but never done
due to revision
as HSSs

Management Unit

Dimensions: Tank diameter: approximately 50'

Date(s) of Operation: 1952 to present

Waste History:

Types: No. 6 Fuel Oil

Volumes: Approximately 700 gallons and approximately
400 gallons

Narrative: The narrative is provided for information only.
The site contains petroleum products not regulated by this
permit.

In January 1971, one of the fuel oil tanks located south of
Central Avenue and west of 7th Street overflowed while being
filled. The fuel oil, approximately 700 gallons, was con-
tained in a diked area, cleaned up, and the fuel oil re-
cycled.

In February 1979, a similar spill of 400 gallons occurred.

11-16
2000

Remediation
intensive

D&D

5

PAC REFERENCE NUMBER: 600-152

IHSS Reference Number: 152, Operable Unit 13

Unit Name: Fuel Oil Tank 221 Spills

Approximate Location: N749,130; E2,082,760

Date(s) of Operation or Occurrence

1955 - present

Description of Operation or Occurrence

Tank 221 is an 800,000-gallon surface-mounted storage tank located east of Building 452. The tank began operation in 1955, and contains Number 6 fuel oil for use in the RFP central steam plant when natural gas is not available. Tank 224, which is located directly east of Tank 221, has a 1,800,000-gallon capacity and is used for the same purpose.

On January 29, 1971, 700 gallons of Number 6 fuel oil leaked from Tank 221. The fill line valve, which is used to transfer oil from transport trucks to the tank, had not been closed after use. Reportedly, the released oil was confined to ditches and an open field area east of the tank. Documentation on the incident indicates that this was the second incident of this nature in four weeks.¹ No documentation regarding the first incident was found.

A leak was discovered in the heater coil of one of the fuel oil tanks on April 4, 1975, when the pressure dropped below the head pressure of oil in the tank. The leak enabled oil to flow through the condensate drain line and into the diked area around the tank.² The specific tank was not documented.

During the week ending February 16, 1979, an estimated 400 gallons of Number 6 fuel oil was spilled during the filling of the Central Avenue storage tanks.³ Neither the specific tank, nor details of the release, were documented.

During the week ending February 17, 1989, approximately 50 gallons of Number 6 fuel oil were released when the valve was left open. Reportedly, the oil did not enter a water course. Documentation on the incident indicates that this was the second spill of this nature in four days.⁴ No details of the first incident were found.

Physical/Chemical Description of Constituents Released

Each release consisted of Number 6 fuel oil.

Responses to Operation or Occurrence

Following the January 1971 incident, ditches and ponds were dug to prevent further spread of contamination. The oil was then scraped up and disposed of in the landfill (PAC NW-114).¹

Cleanup of the February 1971 incident was to be conducted,³ however cleanup activity details were not documented. Possibilities for the destination of the waste included landfill disposal (PAC NW-114), off-site shipping, or reprocessing.³

Cleanup activities following the April 1975 leak were not documented, however the cost of lost oil and cleanup amounted to \$4,680.²